March 15, 2011

VIA ELECTRONIC FILING

Sharon Gillett, Chief Wireline Competition Bureau Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: WC Docket No. 02-60; Request for Additional Pilot Program Funding

Dear Ms. Gillett:

I am writing on behalf of the California Telehealth Network (CTN), to request the Wireline Competition Bureau (WCB) provide additional Rural Health Care Pilot Program (RHCPP) funding to CTN. CTN was initially awarded \$22.1 million in Pilot Program funding and has utilized this funding to create the first statewide telehealth network in California.

We understand that a significant amount of the original \$417 million the Commission set aside for the Pilot Program funding has either been voluntarily relinquished by other projects, or forfeited due to inability to achieve required program filing requirements. These funds will be lost to the RHCPP unless WCB designates successor projects. CTN strongly believes relinquished or unused Pilot Program funding should be redirected to successful projects such as CTN that can deploy additional funding to further program goals such as adding additional sites, increasing bandwidth beyond original program specifications, as well as extending the amount of time original sites may receive subsidies.

Accordingly, CTN is requesting \$90.9 million in additional Pilot Program funding to be expended over an eight-year period, through 2019. This additional funding would allow CTN to achieve the following:

- Allow existing eligible CTN members to extend the 85% Pilot Program subsidy for their monthly recurring costs (MRC) for three additional years (from 2014 through 2017) at a cost of approximately \$15.6 million per year, for a total of \$47 million;
- Allow CTN to add an additional 1100 eligible health care provider members and \$13.9 million per year for three years (from 2014 through 2017) for a total of \$41.8 million.
- Construct a redundant connection at the CENIC Point of Presence (POP) in Sacramento, CA, at a cost of approximately \$100,000 per year for a total of \$600,000.
- Allow CTN to connect to other Rural Health Care Pilot Programs and state telehealth networks such as Oregon Health Network (OHN, Colorado (CTN), and Southwest Telehealth Access Grid (SWTAG). The technology to accomplish these connections is currently under investigation. At this time we cannot accurately estimate the cost of these connections but feel comfortable that the connections will cost approximately \$100,000 annually per connection. For a total of five years this amount will be \$1.5 million.

CTN respectfully requests WCB provide CTN with \$90.9 million in unused or relinquished Pilot Program funding. In the event WCB fully or partially grants CTN's request, CTN respectfully requests WCB also grant CTN additional time to obtain funding commitments to cover the 15% match for these newly available funds, and an additional five years to expend any newly committed funds.

Should you have any questions or require additional information, please contact me at (916) 734-0317.

Sincerely,

Eric Brown,

President & CEO

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cc: Trent Harkrader, Chief, Telecommunications Access Policy Division Jamie Susskind, Attorney Advisor